

EXHIBIT B

Jayne L. Freeman

From: Jayne L. Freeman
Sent: Monday, April 16, 2018 2:03 PM
To: 'joe@joethomas.org'
Cc: Derek C. Chen; LaHoma Walker
Subject: RE: Dalessio--Plaintiff's Motion for Joinder

Joe: as you may have seen, I have now been asked to file a Notice of Appearance for the additional Defendants added via Plaintiff's Amended Complaint. I am also currently authorized to accept service of the Amended Complaint on behalf of Defendants Eliza Saunders, Alison Swenson, and Andrew Palmer. I will let you know as soon as I hear from Mr. Tapper, I am not sure if he is in town this week.

I am renewing my request that you simply strike the Motion for Joinder so we do not have to file some sort of response today. The parties have been added. I have appeared on behalf of the newly-added Defendants and have offered to accept service for 3 of them already. Please let us know if you will be notifying the court that you will strike or withdraw the motion today.

Thank you.

Jayne L. Freeman
KBM KEATING, BUCKLIN
& McCORMACK

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From: joe@joethomas.org [mailto:joe@joethomas.org]
Sent: Friday, April 13, 2018 5:21 PM
To: Jayne L. Freeman <JFreeman@kbmlawyers.com>
Cc: Derek C. Chen <DChen@kbmlawyers.com>; LaHoma Walker <LWalker@kbmlawyers.com>; 'JULIE' <juliedalessio@msn.com>
Subject: RE: Dalessio--Plaintiff's Motion for Joinder

Jayne,

I tried to call your office just now to talk on the phone, but I couldn't get through to anyone. It looks like after 5:00 pm the phones do not go through.

I am going to be honest with you. I would like nothing more to withdraw the Motion, especially since I am going to be gone next week for my wedding that is noted in the joint status report. However, the Court did rule that you, Derek and Lahoma are not proper parties, I do not see anything in the ruling regarding any other proposed party.

Would you like to write some sort of stipulated order that all of the proposed parties should be added? That is a way I think we can save time and effort. I am going to be travelling tomorrow as I have a flight out to Colorado. I will be on and off my email and cell phone on Sunday and Monday if you want to call me about this.

Please let me know how you would to proceed.

Very truly yours,

Joe

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From: Jayne L. Freeman <JFreeman@kbmlawyers.com>
Sent: Friday, April 13, 2018 2:54 PM
To: joe@joethomas.org
Cc: Derek C. Chen <DChen@kbmlawyers.com>; LaHoma Walker <LWalker@kbmlawyers.com>
Subject: Dalessio--Plaintiff's Motion for Joinder

Joe: Defendant's response to Plaintiff's Motion for FRCP 19 and 20 Joinder of parties would be due on Monday in light of your having noted the Motion for hearing on April 20, 2018. As you have now filed Plaintiff's First Amended Complaint [Dkt. 82], which includes additional claims against additional parties, are you still planning to go forward with the Motion for Joinder, or will you strike it? The Motion also still seeks to add parties that Judge Pechman already ruled could not be added. Please let us know at your earliest convenience.

As I indicated yesterday, now that the Amended Complaint has been filed, the University can begin its process for appointment of counsel for new parties that are named in the newly-filed Amended Complaint. If I am appointed as counsel for the individually-named Defendants who have not yet been served, I am happy to inquire as to whether they might waive service or authorize me to accept service on their behalf, and will let you know.

Jayne L. Freeman
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